

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

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|-----------------|---|-----------------------|
| <i>In re:</i> | * | |
| | * | |
| YEON HEE BURGOS | * | Case No. 16-12949-KHK |
| | * | |
| Debtor | * | CHAPTER 7 |

| | | |
|-------------------------|---|-----------------------|
| YING YU XUAN | * | |
| | * | |
| Plaintiff | * | Adv. Pro 16-01213-KHK |
| | * | |
| v. | * | |
| | * | |
| YEON HEE BURGOS, et al. | * | |
| | * | |
| Defendant(s) | * | |

MOTION FOR CONTINUANCE

COMES NOW Plaintiff Ying Yu Xuan, by and through her attorney of record, and respectfully moves the for a continuance of the current scheduled trial date of October 6, 2017, and in support hereof alleges and say that:

1. The Adversary Complaint was filed on or about December 6, 2016 and the Defendant was properly served with the Complaint.
2. At the June 5, 2017 Pretrial Conference, the Parties agreed to an October 6, 2017 trial date.
3. Unfortunately, undersigned counsel now has a scheduling conflict that requires him to be out of the country from October 4, 2017 to October 9, 2017.
4. Accordingly, undersigned counsel is seeking a continuance of the existing trial date.
5. If granted, this would be the first continuance of trial, and Defendants would not be prejudiced as this motion is being filed more than 2 months before trial.
6. All discovery has been completed, and there are no other pending matters currently before this court.

WHEREFORE, the Plaintiff prays of this Court for the following:

- A. That this Court continue the trial date; and
- B. For such other and further relief as to the Court may seem just and proper.

/s/ Jeremy C. Huang

Jeremy C. Huang, VSB No. 76861
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of August, 2017, a copy of the foregoing Motion for Continuance was served via first class mail postage prepaid and/or the Court's Electronic Filing System to the following persons:

Yeon Hee Burgos
13628 Jefferson Davis Highway
Second Floor
Woodbridge VA 22191

Michael W. Kim
Michael W. Kim & Associates, P.C.
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/s/ Jeremy C. Huang